

Exhibit 15

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THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HEADWATER RESEARCH, LLC,

Plaintiff,

vs.

SAMSUNG ELECTRONIC CO., LTD
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Case No.
2:22-CV-00422-RG-RSP

REMOTE VIDEOTAPED DEPOSITION

Via ZOOM of

ALIREZA RAISSINIA

December 15, 2023

9:02 A.M. PST

STENOGRAPHICALLY REPORTED BY:
JO ANN LOSOYA, CSR, RPR, CRR
LICENSE #: 084-002437

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1 Kays on behalf of Mr. Raissinia, the witness.

2 WHEREUPON:

3 ALIREZA RAISSINIA,
4 called as a witness herein, having been first duly
5 sworn, was examined and testified as follows:

6 E X A M I N A T I O N

7 BY MR. HARTZMAN:

8 Q. Could you please state your full name and
9 address for the record.

10 A. Yes, my name is Alireza Raissinia.

11 Q. Your address for the record?

12 A. My home address is 15147 Elm Park, Monte
13 Sereno, California 95030.

14 Q. And, Dr. Raissinia, have you been deposed
15 before?

16 A. I vaguely remember once before.

17 Q. Do you recall when that was?

18 A. No, I don't know precisely.

19 Q. Do you recall what case that was for?

20 A. No. Not at all.

21 Q. Do you recall whether it was anything
22 related to any of the patents asserted in this case?

23 A. No. I do recall that it wasn't.

24 Q. Okay. I'll cover some ground rules
25 before we start.

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1 BY THE WITNESS:

2 A. Yeah, Dave Kays. Sorry. I should be
3 specific.

4 Q. How long did you meet with Mr. Kays?

5 A. I think approximately an hour.

6 Q. Did you meet with anyone else in
7 preparation for today's deposition?

8 A. No one.

9 Q. Did you review any documents in
10 preparation for your deposition?

11 A. No.

12 Q. Do you have any understanding whether any
13 of the patents that you invented are being asserted
14 by Headwater in this lawsuit against Samsung?

15 A. I don't know of any of the patents, no.
16 I'm not clear which patents they are.

17 Q. So did you review any of the asserted
18 patents in preparation for today's deposition?

19 A. No. I don't even have the patents.

20 Q. Okay. Some of those patents may come up
21 during your deposition today, and so, when I
22 introduce it, I will introduce it by its full patent
23 number. But in general, if I refer to a patent by
24 its last three digits, will that make sense to you?

25 A. Sure. You mean, the identifier of the

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1 and your second consulting agreement did your role
2 for Headwater Partners I change?

3 A. No.

4 Q. Why did you break out your work for
5 Headwater into two entries on your LinkedIn?

6 A. And I'm guessing, it sounds like in one
7 case I had ItsOn part of it, and when I stopped
8 working with ItsOn team, I made it separate. Just
9 my guess.

10 MR. KAYS: This experience will no doubt
11 cure you of LinkedIn.

12 BY THE WITNESS:

13 A. I know. I have to go back and think what
14 did I do. I don't even remember when I finished.
15 It must have been right after when I came from ItsOn
16 or Headwater rather.

17 Q. So if I were to remove ItsOn Inc. from
18 that first entry on LinkedIn, did your work for
19 Headwater from 2009 to 2011 remain the same?

20 A. Correct.

21 Q. Do you recall when in 2011 you left
22 Headwater?

23 A. I joined Qualcomm around January 2012 if
24 I remember right. So it must have been during the
25 Christmas holidays I pretty much decided to leave.

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1 Q. So you think you worked at Headwater
2 pretty much up until you restarted again at
3 Qualcomm?

4 A. Yeah. Right.

5 Q. In 2011, Headwater and ItsOn were in
6 talks with some of the major companies we discussed
7 earlier like Verizon and Sprint, weren't they?

8 A. Yeah, I remember Verizon. Again, before
9 you even say it, but Sprint, I forgot about it.
10 When you mention it, it just kind of touched it
11 again in my memory. Probably, yeah. Vodafone like
12 I said.

13 Q. Would you say that Headwater was doing
14 well as a company in 2011?

15 MR. KAYS: Objection, vague.

16 BY THE WITNESS:

17 A. Again, I don't know what you mean by
18 doing well. It was an entity and it was continuing
19 doing what it was targeted to do.

20 Q. Well --

21 A. There was no idea of closing it down, if
22 that's what you were thinking. I didn't get any
23 vibe that it's going to be closed down for any
24 reason.

25 Q. How did your compensation at Headwater